

CALIFORNIA CIVIL RIGHTS LAW GROUP

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Attorneys for Plaintiffs,
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF LAWRENCE
ORGAN IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT
CITISTAFF SOLUTIONS, INC.'S
MOTION FOR SUMMARY
JUDGEMENT, OR IN THE
ALTERNATIVE FOR SUMMARY
ADJUDICATION OF ISSUES**

Date: October 23, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 201

1 I, LAWRENCE ORGAN, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Declaration in support of
5 Plaintiffs' Opposition to Defendant's Motion for Summary Judgment. I have personal
6 knowledge of the facts stated herein and if called upon to testify, I could and would competently
7 testify thereto, except as to those matters that are stated upon information and belief.
8

9 2. Attached hereto and marked as Exhibit 1 is a true and correct copy of various
10 excerpts from the deposition of Monica De Leon.

11 3. Attached hereto and marked as Exhibit 2 is a true and correct copy of various
12 excerpts from the deposition of Ludivina Ledesma.
13

14 4. Attached hereto and marked as Exhibit 3 is a true and correct copy of various
15 excerpts from the deposition of Edward Romero.

16 5. Attached hereto and marked as Exhibit 4 is a true and correct copy of various
17 excerpts from the deposition of Michael Wheeler.
18

19 6. Attached hereto and marked as Exhibit 5 is a true and correct copy of various
20 excerpts from the deposition of Wayne Jackson.

21 7. Attached hereto and marked as Exhibit 6 is a true and correct copy of various
22 excerpts from the deposition of Victor Quintero.
23

24 8. Attached hereto and marked as Exhibit 7 is a true and correct copy of various
25 excerpts from the deposition of Kevin McGinn.

26 9. Attached hereto and marked as Exhibit 8 is a true and correct copy of a document
27 produced by Plaintiff Owen Diaz in discovery and Bates-stamped ODIAS000209.
28

1 10. Attached hereto and marked as Exhibit 9 is a true and correct copy of Defendant
2 Citistaff Solutions, Inc.,’s Responses to Plaintiff Owen Diaz’s Interrogatories, Set One.

3
4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct. Executed on October 2, 2019 in San Anselmo, California.

6
7 DATED: October 2, 2019

By: /s Lawrence Organ
Lawrence A. Organ, Esq.
Navruz Avloni, Esq.
Attorneys for Plaintiffs
DEMETRIC DI-AZ AND OWEN DIAZ